ALLTEL Communications, Inc.
E-911
Tenth Quarterly Report
February 1, 2005
CC Docket No. 94-102

Introduction

ALLTEL Communications, Inc. ("ALLTEL") is a cellular and PCS provider subject to the Phase II deployment requirements for Tier II carriers as contained in the Commission's Order to Stay, CC Docket No. 94-102, 17 FCC Rcd 14841 (2002) ("Stay Order"). ALLTEL has chosen an AGPS handset-based location technology to comply with the Phase II E-911 requirements. Under the terms of the Stay Order, ALLTEL was required by May 31, 2003, to ensure that at least 25% of all new handsets activated were location capable; 50% by November 30, 2003; and 100% by May 31, 2004. Further, the Stay Order requires that ALLTEL penetrate 95% of its subscriber base with ALI capable handsets by December 31, 2005. ALLTEL is also required to begin delivering Phase II enhanced service to PSAPs by the later of six months of a bona fide PSAP request or March 1, 2003. As previously reported, ALLTEL has exceeded past deployment thresholds for deployment of location capable handsets. ALLTEL is implementing Phase I and Phase II service to PSAPs in accord with the activation timetables negotiated with the PSAPs. The instant report is submitted pursuant to paras. 28-31 of the Stay Order, and in accordance with the procedures established by Public Notice, Wireless Telecommunications Bureau Standardizes Reporting on Wireless E-911 Implementation, DA 03-1902 (released June 6, 2003). The spreadsheet required under the Public Notice is attached hereto.

ALLTEL has continued to actively engage the PSAPs within its market areas to ensure timely activation of both Phase I and Phase II E-911 services as early as possible given the status and readiness of the particular PSAP, the availability of vendor equipment and LEC upgrades, as well as the Commission's deadlines for Phase II E-911 under the Stay Order.

Discussion

I. Phase II AGPS Network Deployments

As previously reported, ALLTEL has completed switch upgrades, deployment and testing of redundant MPC/PDEs, and has implemented redundant trunking between these units. ALLTEL has configured its system consistent with the standard E-2 interface and has completed testing. As previously advised, further real-world testing of the MPC/PDE is necessary on a PSAP-by-PSAP basis to ensure end-to-end functionality. ALLTEL is engaged in such testing with capable PSAPs prior to cutting to live service. ALLTEL recently acquired TDMA-based systems from MobileTel and US Cellular and is deploying CDMA overlays in those markets that will facilitate Phase II compliance via

ALLTEL's existing Phase II AGPS handset-based technology solution. ALLTEL also has pending before the Commission proposed transactions with Cingular and Public Service Cellular Corp which will involve similar technology conversions from TDMA/GSM to CDMA. ALLTEL anticipates that Phase II compliance for these markets, with a potential limited exception, will be achieved through use of the AGPS handset-based technology solution and integration with the network component of ALLTEL's existing Phase II solution.

II. Handset Deployment

The Stay Order requires that ALLTEL, as a Tier II carrier, reach a 25% deployment threshold for ALI-capable handsets as a percentage of all new handsets sold by May 31, 2003, 50% by November 30, 2003, and 100% for new digital activations by May 31, 2004. As previously reported, ALLTEL began deploying and activating its first ALI capable handsets in its markets on June 30, 2002 well in advance of the required March 1, 2003 date. It exceeded the May 31, 2003 handset deployment threshold (25% of new activations) with AGPS equipped handsets comprising approximately 30.3% of new handset activations as of that date. It also exceeded the November 30, 2003 threshold (50% of new activations) with AGPS equipped handsets comprising approximately 98% of new handset activations as of that date. ALLTEL has substantially complied with the May 31, 2004 threshold requirement that 100% of all new digital handset activations must be ALI-capable,[1] subject to such further coordination and confirmation with staff as to compliance plans for the recently acquired MobileTel and US Cellular markets. In anticipation of the December 2005 deployment deadline, ALLTEL has conducted an internal review of handset activations on a granular ESN by ESN basis with the assistance of its vendors to ensure that all location capable handsets are tracked accurately throughout ALLTEL's distribution system. Also, ALLTEL has coordinated with Bureau staff with respect to handset deployment in the aforementioned TDMA/GSM markets that ALLTEL intends to acquire with respect to ALLTEL's plans to expeditiously bring those markets into full compliance with the 100% new digital handset activation benchmark.

Based on the current pace of migration to ALI-capable handsets, as well as its recent acquisitions of TDMA-based systems, ALLTEL may have difficult complying with the December 31, 2005 requirement to be 95% penetrated. ALLTEL is continuously monitoring its number of activated ALI-capable handsets and will undertake ongoing efforts directed toward augmenting ALI capable handset penetration.

The following is a summary list of AGPS-enabled handsets distributed by ALLTEL and their launch dates:

[1] An ALLTEL internal review has revealed isolated activations of some customer-owned and other non-ALI-capable handsets, contrary to established ALLTEL policy governing the activation of such handsets. Corrective action has been undertaken to ensure that this policy is adhered to in the future.

Audiovox 9155	6/30/02
Kyocera 2325	10/4/02
Motorola 120e	10/10/02
Kyocera 7135	11/02
Toshiba CDM9500	11/02
Kyocera 3225	3/03
Motorola T720	2/03
Nokia 3585I	7/03
Motorola V60x	9/03
LG 5450	12/03
Kyocera 3250	1/04
Audiovox 8410	1/04
LG VX3100	2/04
Kyocera KX434	3/04
Kyocera SE44	6/04
Nokia 3587I	7/04
LG 5550	8/04
Audiovox 8910	11/04
Motorola V710	11/04
LG 3200	11/04
Motorola V262	12/04

III. Accuracy Requirements and Methodology

ALLTEL's extensive testing and evaluation processes were previously reported and detailed in its earlier Quarterly Reports. ALLTEL has transitioned from testing and evaluating its AGPS solution, which ALLTEL believes is compliant with the Commission's rules and consistent with OET Bulletin 71, to real-world deployment of its technology in response to valid PSAP requests. ALLTEL has contracted with TechnoCom to develop procedures and provide assistance to establish proper techniques to configure each cell site and sector as well as to ensure accurate delivery of Phase II location information to capable PSAPs. ALLTEL and Metapath Software International, d.b.a. Marconi Wireless and Intrado, Inc. are working closely with individual capable PSAPs to further test and refine the accuracy and reliability of its solution, taking into account the particulars of each individual PSAP's network and capabilities. In all markets in which PSAPs have requested service ALLTEL is capable of transmitting Phase II-compliant ALI to the PSAP for all of its MSC vendors – Lucent, Nortel and Motorola. As discussed below, additional testing is required as individual PSAPs complete their own upgrades and deployment proceeds on a PSAP by PSAP basis. Finally, ALLTEL continues to test new ALI-capable handsets prior to their acceptance into its product line to establish benchmarks for Phase II location accuracy.

IV. Deployment Issues

As previously reported, ALLTEL has encountered the same PSAP, vendor and LEC issues as well as the technology hurdles normally experienced with the initial

deployment of a maturing technology. These issues have arisen in both the Phase I and Phase II contexts. ALLTEL's experience continues to be that, in most markets, problems can continue to be resolved in time for timely or mutually agreed-to deployment of Phase II to PSAPs.

Regarding systems ALLTEL has acquired through acquisition, ALLTEL continues to overlay and convert these TDMA systems to CDMA, and, consequently, its handset-based E-911 Phase II solution, in order to provide Phase II service in response to valid PSAP requests. ALLTEL continues to work hand-in-hand with the PSAPs in these markets to ensure timely deployment according to the negotiated dates.

V. Status of Phase I and Phase II Deployment Efforts.

ALLTEL continues to strive for early E-911 deployment. Additional markets are moving toward live Phase II deployment rapidly. Detailed spreadsheets on both Phase I and Phase II deployment schedules are attached to this filing. ALLTEL would be pleased to provide the Commission with such additional information as it may require.

A. Phase I

ALLTEL has deployed Phase I service in response to over 750 PSAP requests. ALLTEL has approximately 80 PSAP requests for Phase I in progress with implementation scheduled for the agreed upon deployment date listed in the attached spreadsheets.

B. Phase II

To date ALLTEL has received 484 Phase II requests. Of this number, over 350 requests have been met and service has been cut-live, while approximately 100 requests are in progress with deployment scheduled for the agreed upon dates listed on the attached spreadsheets.[2]

C. General Condition

As previously reported technology issues for ALLTEL's multi-vendor network have largely been resolved, and ALLTEL continues to work aggressively on a PSAP-by-PSAP basis. Although some minor delays in Phase II service may occur in some markets, ALLTEL has taken all the steps not dependent on PSAP readiness: it has completed all hardware and software upgrades necessary in its own network and completed testing; accounted for all trunking between its system to the selective router and the ALI database; and established and maintained contact with the PSAPs to obtain

[2] The November 2004 report erroneously indicated that over 500 Phase II requests had been received, with 400 requests cut-live. The correct figures should have been over 400 and over 300 requests, respectively. The spreadsheet attached to the November 2004 report accurately listed the number and status of the Phase II requests.

any necessary information. Order on Reconsideration, FCC 02-318, ¶ 21 (rel. Nov. 26, 2002), codified at 47 C.F.R. § 20.18(j)(4)(vi). As discussed above, however, full end-to-end testing requires PSAP participation. Also, as discussed in previous reports (incorporated herein by reference) further refinements are necessary during the final deployment stages, as each PSAP's network and equipment is different. ALLTEL continues to arrive at mutually agreed upon launch dates with its PSAPs. *See* 47 C.F.R. § 20.18(j)(5). Nevertheless, in some markets there is a chance that ALLTEL will encounter unforeseen delay in implementation and, consequently, may need to seek specific and limited relief from deployment deadlines. ALLTEL's good faith efforts warrant Commission flexibility as ALLTEL works through the PSAP-specific issues that will arise during final end-to-end testing with PSAPs.[3]

ALLTEL would be pleased to provide the Commission with such additional information as the Commission may require.

[3] As the Commission has acknowledged, an additional period of time is required between the time the PSAP becomes E-911 capable and the date of service launch. *See* 47 C.F.R. § 20.18(j)(4)(x) (affording certifying carriers 90 days to provide E911 service after the PSAP becomes capable).

Declaration

I have read the foregoing E-911 Tenth Quarterly Report of ALLTEL Communications, Inc. and declare under penalty of perjury that it is true and correct to the best of my information and belief. Executed February 1, 2005.

/s/_____

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CERTIFICATE OF SERVICE

I, Glenn S. Rabin, hereby certify that on the 1st day of February, 2005, I caused copies of the foregoing "Tenth Quarterly Report" to be sent to the following by first class mail, postage pre-paid, to the following:

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